

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANDRE BOYER and PENNSYLVANIA  
S.I.T.E.S. AGENTS, LLC,

Plaintiffs,

v.

Civil Action No. 5:23-CV-02885-JLS

CITY OF PHILADELPHIA, et al.,

JURY TRIAL OF 12 DEMANDED

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO  
RESPOND TO MOTION TO DISMISS BY THE CITY DEFENDANTS**

NOW COMES Plaintiffs, by their undersigned counsel, who respectfully file this unopposed Motion and offer the following:

1. On December 18, 2023, a week before the Christmas holiday and two weeks before the New Year's Day holidays, the City-Defendants filed a Motion to Dismiss at ECF No. 29. The Brief in Support is 36 pages long, addressing each and every claim brought by Plaintiffs.
2. Due to absence during the holidays, undersigned counsel requests an enlargement of time of one week to respond, on or before January 9, 2024.
3. On January 2, 2024, undersigned counsel contacted defense counsel for the City Defendants, Attorney Danielle Rosenthal, who informed undersigned counsel that City Defendants do not oppose this Motion.

**WHEREFORE**, Plaintiffs respectfully request that the Court grant this motion and enter the proposed order, enlarging time for Plaintiffs to respond to ECF No. 29 by setting a deadline on or before January 9, 2024; and such other relief as the Court deems necessary, just, or appropriate.

Respectfully submitted,

**CORNERSTONE LAW FIRM, LLC**

Dated: January 2, 2024

By: /s/ Joel A. Ready  
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